Brix Maritime Company Response to EPA's 104(e) Information Request Entire response Releasable

EPA Region 10 Superfund
RELEASABLE
Date 11-23-09
Initial 408.



Department of Environmental Quality

Northwest Region Portland Office 2020 SW 4th Avenue, Suite 400 Portland, OR 97201-4987 (503) 229-5263 FAX (503) 229-6945 TTY (503) 229-5471

January 7, 2008

Also Sent Via E-mail

Mr. Leon Lahiere, Senior Associate Hart Crowser, Inc. Five Centerpointe Drive, Suite 240 Lake Oswego, OR 97035-8652

Re:

Stormwater System Sampling and Analysis Work Plan

Brix Maritime Company

Portland, Oregon ECSI No. 2364

Dear Mr. Lahiere:

The Oregon Department of Environmental Quality (DEQ) has reviewed the "Stormwater System Sampling and Analysis Work Plan, Brix Maritime – Portland, 9030 NW St. Helens Road, Portland, Oregon – ECSI No. 2364" dated December 20, 2007 (Final Stormwater System SAP). Hart Crowser, Inc. prepared the Final Stormwater System SAP on behalf of the Brix Maritime Company (Brix). The Final Stormwater System SAP presents the approach to collecting and analyzing sediment and stormwater samples from the stormwater conveyance system at the Brix facility. The goals of the stormwater system sampling and analytical program are to meet the data collection objectives of the Joint Source Control Strategy and support an evaluation of the facility's stormwater system as a potential source of contamination to the Willamette River.

The Final Stormwater System SAP has been revised and resubmitted in response to DEQ's October 18, 2007 comments letter regarding the Stormwater System SAP ² previously submitted by Brix.

Based on our review of the document DEQ:

- Acknowledges that the Final Stormwater System SAP has been revised consistent with our October 18th comments letter; and
- Approves the document for implementation at the site.

¹ EPA and DEQ, 2005, "Portland Harbor Joint Source Control Strategy – Final," December (note Table 3-1 updated July 16, 2007), a guidance document prepared jointly by the US Environmental Protection Agency and Oregon Department of Environmental Quality.

² Hart Crowser, Inc., 2007, "Stormwater System Sampling and Analysis Plan, Brix Maritime – Portland, 9030 NW St. Helens Road, Portland, Oregon – ECSI No. 2364," September 7, a sampling and analysis plan prepared for the Brix Maritime Company (Brix).

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DEQ encourages Brix to initiate the stormwater system sediment sampling as soon practicable so that sample analysis, data screening, stormwater parameter selection, and stormwater sampling can be performed before the end of the current cycle of seasonal precipitation.

Please don't hesitate to contact if you have questions regarding this letter.

Sincerely,

Mr. Dana Bayuk, R.G.

Project Manager

Portland Harbor Section

Cc: Frank Williamson, Brix

Leslie Schenck, Garvey Schubert & Barer

Karen Tarnow, NWR/PHS ECSI File No. 2364









































































































































